

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Jane Doe (J.R.L.), an individual,

Plaintiff,

v.

Hilton Domestic Operating Company Inc.;
Hilton Domestic Management LLC; and
Crosstown Center Hotel LLC d/b/a Hampton
Inn & Suites,

Defendants.

Civil Action No. 1:24-cv-13227-PBS

**DEFENDANT HILTON DOMESTIC OPERATING COMPANY INC.'S ANSWER
AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S ORIGINAL COMPLAINT**

Defendant Hilton Domestic Operating Company Inc. ("Hilton"), by and through its counsel, answers Plaintiff J.R.L.'s Original Complaint (the "Complaint"), ECF. No. 001, as follows:

SUMMARY

1. In response to Paragraph 1, Hilton denies the allegations. As to the accompanying footnote, Hilton admits that Plaintiff's Motion to Proceed Under Pseudonym was filed simultaneously with the Complaint.

2. Paragraph 2, including the accompanying footnote, is a statement of law that does not require admission or denial. Hilton responds that the law speaks for itself and denies the allegations to the extent they are inconsistent with the same.

3. In response to Paragraph 3, including the accompanying footnotes, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

4. In response to Paragraph 4, including the accompanying footnotes, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

5. The first sentence of Paragraph 5, including the accompanying footnote, is a statement of law that does not require admission or denial. Hilton responds that the law speaks for itself and denies the allegations to the extent they are inconsistent with the same. In response to the second sentence of Paragraph 5, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

6. In response to Paragraph 6, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

7. Paragraph 7 is a statement of law that does not require admission or denial. Hilton responds that the TVPRA speaks for itself and denies the allegations to the extent they are inconsistent with the same.

8. Paragraph 8 is a statement of law that does not require admission or denial. Hilton responds that the TVPRA speaks for itself and denies the allegations to the extent they are inconsistent with the same.

9. In response to Paragraph 9, Hilton denies the allegations.

10. In response to Paragraph 10, Hilton denies the allegations.

PARTIES

11. In response to Paragraph 11, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

12. In response to Paragraph 12, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

13. In response to Paragraph 13, Hilton admits that Hilton Domestic Operating Company Inc. is a Delaware corporation with its principal place of business in Virginia.

14. The allegations in Paragraph 14 are directed at a different (now dismissed) defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

15. As to the allegations in Paragraph 15 that are directed at a different (now dismissed) defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 15 directed at Hilton, Hilton denies the allegations.

16. In response to Paragraph 16, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

17. The allegations in Paragraph 17 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

18. The allegations in Paragraph 18 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

19. In response to Paragraph 19, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

20. In response to Paragraph 20, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

JURISDICTION & VENUE

21. In response to Paragraph 21, Hilton admits that this Court has original jurisdiction.

22. In response to Paragraph 22, Hilton admits that it is not contesting venue in this matter.

23. In response to Paragraph 23, Hilton admits that it is not contesting venue in this matter.

STATEMENT OF FACTS

I. Jane Doe (J.R.L) is a Survivor of Unlawful Sex Trafficking at a Hotel Owned, Operated, Managed and Controlled by Defendants.

24. To the extent heading “I.” contains factual allegations, Hilton denies them. In response to Paragraph 24, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

25. In response to Paragraph 25, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

26. As to the allegations in Paragraph 26 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 26 directed at Hilton, Hilton denies the allegations.

27. As to the allegations in Paragraph 27 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 27 directed at Hilton, Hilton denies the allegations.

28. As to the allegations in Paragraph 28 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 28 directed at Hilton, including the accompanying footnote, Hilton denies the allegations.

II. The Hotel Industry's Role in Sex Trafficking and Hotel Defendants' Knowledge of the Problem.

29. To the extent heading "II." contains factual allegations, Hilton denies them. As to the allegations in Paragraph 29 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 29 directed at Hilton, Hilton denies the allegations.

30. In response to Paragraph 30, including the accompanying footnotes, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

31. As to the allegations in Paragraph 31 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 31 directed at Hilton, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

32. In response to Paragraph 32, including the accompanying footnote, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

33. As to the allegations in Paragraph 33 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 33 directed at Hilton, including the subparagraphs and accompanying footnote, Hilton denies the allegations.

34. In response to Paragraph 34, including the accompanying footnote, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

35. In response to Paragraph 35, including the accompanying footnote, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

36. The first sentence of Paragraph 36 is a statement of law that does not require admission or denial. Hilton responds that the TVPRA speaks for itself and denies the allegations to the extent they are inconsistent with the same. As to the rest of the allegations in Paragraph 36 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the rest of the allegations in Paragraph 36 directed at Hilton, including the accompanying footnote, Hilton denies the allegations.

37. As to the allegations in Paragraph 37 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 37 directed at Hilton, Hilton denies the allegations.

38. As to the allegations in Paragraph 38 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 38 directed at Hilton, Hilton denies the allegations.

39. In response to Paragraph 39, including the quotation and accompanying footnotes, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

40. As to the allegations in Paragraph 40 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 40 directed at Hilton, including the accompanying footnote, Hilton denies the allegations.

41. In response to Paragraph 41, Hilton denies the allegations.

42. In response to Paragraph 42, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

43. As to the allegations in Paragraph 43 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 43 directed at Hilton, Hilton denies the allegations.

44. As to the allegations in Paragraph 44 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 44 directed at Hilton, Hilton denies the allegations to the extent they are inconsistent with the law.

45. As to the allegations in Paragraph 45 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 45 directed at Hilton, including subparagraphs a–d and the accompanying footnotes, Hilton denies the allegations.

46. As to the allegations in Paragraph 46 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 46 directed at Hilton, Hilton denies the allegations.

47. As to the allegations in Paragraph 47 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 47 directed at Hilton, Hilton denies the allegations.

III. Sex Trafficking Has Long Been Prevalent at Hilton Hotels, and Hilton Defendants Has [sic] Known About It.

48. To the extent heading “III.” contains factual allegations, Hilton denies them. As to the allegations in Paragraph 48 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 48 directed at Hilton, Hilton denies the allegations.

A. Sex Trafficking at Hilton Branded Hotels was well Known by Hilton Defendants.

49. To the extent heading “III.A.” contains factual allegations, Hilton denies them. As to the allegations in Paragraph 49 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 49 directed at Hilton, Hilton denies the allegations.

50. As to the allegations in Paragraph 50 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 50 directed at Hilton, Hilton denies the allegations. In response to the subparagraphs and accompanying footnotes, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

51. As to the allegations in Paragraph 51 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 51 directed at Hilton, Hilton denies the allegations.

52. As to the allegations in Paragraph 52 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 52 directed at Hilton, Hilton denies the allegations.

53. As to the allegations in Paragraph 53 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 53 directed at Hilton, including subparagraphs a–e, Hilton denies the allegations.

IV. Jane Doe (J.R.L.)’s Sex Trafficking at the Subject Hampton Inn.

54. To the extent heading “IV.” contains factual allegations, Hilton denies them. In response to Paragraph 54, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

A. The Hilton Defendants and Franchisee Defendant had actual and constructive knowledge of widespread and ongoing sex trafficking at the Subject Hampton Inn.

55. To the extent heading “IV.A.” contains factual allegations, Hilton denies them. As to the allegations in Paragraph 55 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 55 directed at Hilton, Hilton denies the allegations.

56. As to the allegations in Paragraph 56 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 56 directed at Hilton, Hilton denies the allegations.

57. As to the allegations in Paragraph 57 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 57 directed at Hilton, Hilton denies the

allegations. In response to subparagraphs a–k and the accompanying footnotes, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

58. As to the allegations in Paragraph 58 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 58 directed at Hilton, Hilton denies the allegations.

59. As to the allegations in Paragraph 59 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 59 directed at Hilton, Hilton denies the allegations.

60. As to the allegations in Paragraph 60 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 60 directed at Hilton, Hilton denies the allegations.

61. In response to Paragraph 61, Hilton denies the allegations.

62. As to the allegations in Paragraph 62 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 62 directed at Hilton, Hilton denies the allegations.

63. As to the allegations in Paragraph 63 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 63 directed at Hilton, Hilton denies the allegations.

64. As to the allegations in Paragraph 64 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 64 directed at Hilton, Hilton denies the allegations.

65. The allegations in Paragraph 65, including subparagraphs a–f, are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

66. The allegations in Paragraph 66 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

67. As to the allegations in Paragraph 67 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 67 directed at Hilton, Hilton denies the allegations.

68. As to the allegations in Paragraph 68 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 68 directed at Hilton, Hilton denies the allegations.

69. As to the allegations in Paragraph 69 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 69 directed at Hilton, Hilton denies the allegations.

70. As to the allegations in Paragraph 70 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 70 directed at Hilton, Hilton denies the allegations.

71. As to the allegations in Paragraph 71 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 71 directed at Hilton, including subparagraphs a–k, Hilton denies the allegations.

72. As to the allegations in Paragraph 72 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 72 directed at Hilton, Hilton denies the allegations.

73. As to the allegations in Paragraph 73 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 73 directed at Hilton, Hilton denies the allegations.

74. As to the allegations in Paragraph 74 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 74 directed at Hilton, Hilton denies the allegations.

75. As to the allegations in Paragraph 75 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 75 directed at Hilton, Hilton denies the allegations.

76. As to the allegations in Paragraph 76 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 76 directed at Hilton, Hilton denies the allegations.

B. Defendants knew Jane Doe (J.R.L.) was being trafficked at the Subject Hampton Inn because of the apparent and obvious “red flags” of sex trafficking.

77. To the extent heading “IV.B.” contains factual allegations, Hilton denies them. As to the allegations in Paragraph 77 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 77 directed at Hilton, including subparagraph g, Hilton denies the allegations. In response to subparagraphs a–f and h–i, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

78. As to the allegations in Paragraph 78 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 78 directed at Hilton, Hilton denies the allegations.

79. As to the allegations in Paragraph 79 that are directed at a different defendant and/or regarding a different hotel, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 79 directed at Hilton, Hilton denies the allegations.

80. As to the allegations in Paragraph 80 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 80 directed at Hilton, Hilton denies the allegations.

81. As to the allegations in Paragraph 81 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 81 directed at Hilton, Hilton denies the allegations.

82. As to the allegations in Paragraph 82 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 82 directed at Hilton, Hilton denies the allegations.

83. As to the allegations in Paragraph 83 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 83 directed at Hilton, Hilton denies the allegations.

84. As to the allegations in Paragraph 84 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 84 directed at Hilton, Hilton denies the allegations.

C. Defendant Crosstown Center Hotel LLC d/b/a Hampton Inn & Suites facilitated the trafficking activity at the Subject Hampton Inn, that resulted in the trafficking of Jane Doe (J.R.L).

85. To the extent heading “IV.C.” contains factual allegations, Hilton denies them. As to the allegations in Paragraph 85 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 85 directed at Hilton, Hilton denies the allegations.

86. The allegations in Paragraph 86 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

87. The allegations in Paragraph 87 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

88. The allegations in Paragraph 88 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

89. The allegations in Paragraph 89, including subparagraphs a–h, are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

90. The allegations in Paragraph 90 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

91. The allegations in Paragraph 91 are directed at a different defendant, so Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

92. As to the allegations in Paragraph 92 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 92 directed at Hilton, Hilton denies the allegations.

D. Hilton Defendants facilitated the trafficking activity at the Subject Hampton Inn, that resulted in the trafficking of Jane Doe (J.R.L).

93. To the extent heading “IV.D.” contains factual allegations, Hilton denies them. As to the allegations in Paragraph 93 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 93 directed at Hilton, including subparagraphs a–j and the accompanying footnote, Hilton denies the allegations.

94. As to the allegations in Paragraph 94 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 94 directed at Hilton, Hilton denies the allegations.

95. As to the allegations in Paragraph 95 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 95 directed at Hilton, Hilton denies the allegations.

96. As to the allegations in Paragraph 96 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 96 directed at Hilton, Hilton denies the allegations.

97. As to the allegations in Paragraph 97 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 97 directed at Hilton, including subparagraphs a–o, Hilton denies the allegations.

98. As to the allegations in Paragraph 98 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 98 directed at Hilton, including subparagraphs a–l and the accompanying footnotes, Hilton denies the allegations.

99. As to the allegations in Paragraph 99 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 99 directed at Hilton, Hilton denies the allegations.

100. As to the allegations in Paragraph 100 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 100 directed at Hilton, Hilton denies the allegations.

101. As to the allegations in Paragraph 101 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 101 directed at Hilton, Hilton denies the allegations.

102. As to the allegations in Paragraph 102 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 102 directed at Hilton, Hilton denies the allegations.

103. As to the allegations in Paragraph 103 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 103 directed at Hilton, Hilton denies the allegations.

104. As to the allegations in Paragraph 104 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 104 directed at Hilton, Hilton denies the allegations.

105. As to the allegations in Paragraph 105 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 105 directed at Hilton, Hilton denies the allegations.

106. As to the allegations in Paragraph 106 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 106 directed at Hilton, Hilton denies the allegations.

107. As to the allegations in Paragraph 107 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 107 directed at Hilton, Hilton denies the allegations.

V. Defendants' benefit from ventures at the Subject Hampton Inn.

108. To the extent heading "V." contains factual allegations, Hilton denies them. As to the allegations in Paragraph 108 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 108 directed at Hilton, Hilton denies the allegations.

109. As to the allegations in Paragraph 109 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 109 directed at Hilton, Hilton denies the allegations.

110. As to the allegations in Paragraph 110 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 110 directed at Hilton, Hilton denies the allegations.

111. As to the allegations in Paragraph 111 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 111 directed at Hilton, Hilton denies the allegations.

112. As to the allegations in Paragraph 112 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 112 directed at Hilton, Hilton denies the allegations.

113. As to the allegations in Paragraph 113 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 113 directed at Hilton, Hilton denies the allegations.

114. As to the allegations in Paragraph 114 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 114 directed at Hilton, Hilton denies the allegations.

115. As to the allegations in Paragraph 115 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 115 directed at Hilton, Hilton denies the allegations.

116. As to the allegations in Paragraph 116 that are directed at a different defendant, including subparagraphs a–b and d, Hilton is without knowledge sufficient to admit or deny the

allegations and, on that basis, denies them. In response to the allegations in Paragraph 116 directed at Hilton, including subparagraph c, Hilton denies the allegations.

117. As to the allegations in Paragraph 117 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 117 directed at Hilton, Hilton denies the allegations.

118. As to the allegations in Paragraph 118 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 118 directed at Hilton, Hilton denies the allegations.

119. As to the allegations in Paragraph 119 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 119 directed at Hilton, Hilton denies the allegations.

120. As to the allegations in Paragraph 120 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 120 directed at Hilton, Hilton denies the allegations.

121. As to the allegations in Paragraph 121 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 121 directed at Hilton, Hilton denies the allegations.

122. As to the allegations in Paragraph 122 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 122 directed at Hilton, Hilton denies the allegations.

123. As to the allegations in Paragraph 123 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 123 directed at Hilton, Hilton denies the allegations.

VI. Franchisee Defendant Operated as Hilton Defendants' Actual Agents.

124. To the extent heading "VI." contains factual allegations, Hilton denies them. As to the allegations in Paragraph 124 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 124 directed at Hilton, Hilton denies the allegations.

125. As to the allegations in Paragraph 125 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 125 directed at Hilton, Hilton denies the allegations.

126. As to the allegations in Paragraph 126 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 126 directed at Hilton, including subparagraphs a–d, Hilton denies the allegations.

127. As to the allegations in Paragraph 127 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 127 directed at Hilton, Hilton denies the allegations.

128. As to the allegations in Paragraph 128 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 128 directed at Hilton, including subparagraphs a–h, Hilton denies the allegations.

129. As to the allegations in Paragraph 129 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 129 directed at Hilton, including subparagraphs a–w, Hilton denies the allegations.

130. As to the allegations in Paragraph 130 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 130 directed at Hilton, Hilton denies the allegations.

131. As to the allegations in Paragraph 131 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 131 directed at Hilton, Hilton denies the allegations.

132. As to the allegations in Paragraph 132 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 132 directed at Hilton, Hilton denies the allegations.

133. As to the allegations in Paragraph 133 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 133 directed at Hilton, Hilton denies the allegations.

134. As to the allegations in Paragraph 134 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 134 directed at Hilton, Hilton denies the allegations.

VII. Defendants are jointly and severally responsible for the trafficking of Jane Doe (J.R.L)

135. To the extent heading “VII.” contains factual allegations, Hilton denies them. As to the allegations in Paragraph 135 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 135 directed at Hilton, Hilton denies the allegations.

136. As to the allegations in Paragraph 136 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 136 directed at Hilton, Hilton denies the allegations.

137. As to the allegations in Paragraph 137 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them. In response to the allegations in Paragraph 137 directed at Hilton, Hilton denies the allegations.

138. As to the allegations in Paragraph 138 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 138 directed at Hilton, Hilton denies the allegations.

CAUSES OF ACTION

139. Hilton incorporates its prior paragraphs.

I. Count I: Beneficiary Liability under §1595 (a) of the TVPRA. (All Defendants)

140. To the extent heading “I.” contains factual allegations, Hilton denies them. In response to Paragraph 140, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies the allegations.

141. In response to Paragraph 141, Hilton denies the allegations.

142. In response to Paragraph 142, including subparagraphs a–f, Hilton denies the allegations.

143. In response to Paragraph 143, including subparagraphs a–e, Hilton denies the allegations.

II. Count II: Vicarious Liability for TVPRA Violations.

144. To the extent heading “II.” contains factual allegations, Hilton denies them. In response to Paragraph 144, Hilton denies the allegations.

145. In response to Paragraph 145, Hilton denies the allegations.

146. Paragraph 146 is a statement of law that does not require admission or denial. Hilton responds that the TVPRA speaks for itself and denies the allegations to the extent they are inconsistent with the same.

147. In response to Paragraph 147, Hilton denies the allegations.

148. As to the allegations in Paragraph 148 that are directed at a different defendant, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies

them. In response to the allegations in Paragraph 148 directed at Hilton, Hilton denies the allegations.

149. In response to Paragraph 149, Hilton denies the allegations.

150. In response to Paragraph 150, Hilton denies the allegations.

DAMAGES

151. In response to Paragraph 151, Hilton denies the allegations.

152. In response to Paragraph 152, Hilton denies the allegations.

153. In response to Paragraph 153, including subparagraphs a–l, Hilton denies the allegations.

154. In response to Paragraph 154, Hilton denies the allegations.

155. In response to Paragraph 155, Hilton denies the allegations.

156. In response to Paragraph 156, Hilton denies the allegations.

157. In response to Paragraph 157, Hilton denies the allegations.

DISCOVERY RULE

158. In response to Paragraph 158, Hilton denies that Plaintiff is entitled to the discovery rule or the continuing tort doctrine.

159. In response to paragraph 159, which is regarding a different hotel, Hilton is without knowledge sufficient to admit or deny the allegations and, on that basis, denies them.

160. In response to paragraph 160, which is regarding a different hotel, Hilton denies the allegations.

JURY TRIAL

161. In response to paragraph 161, Hilton admits that Plaintiff demands a jury trial.

RELIEF SOUGHT

162. In response to Plaintiff's prayer for judgment, Hilton denies that Plaintiff is entitled to any relief.

AFFIRMATIVE AND OTHER DEFENSES

163. Plaintiff's Complaint fails to state a claim upon which relief can be granted.

164. There is not an actual or apparent agency relationship between Hilton and the hotel property in question.

165. The incidents in question and all damages complained of and claimed by Plaintiff, if any, were the fault of other parties not under the exercise or control of Hilton. Plaintiff's alleged injuries and damages were caused in whole or in part by the criminal acts of third parties who are not parties to this litigation.

166. The incidents in question and all damages complained of and claimed by Plaintiff, if any, were the fault of one or more independent acts or omissions, destroying any causal connection between any act or omission of Hilton (which are denied) and the alleged injury to Plaintiff.

167. The incidents in question and all damages complained of and claimed by Plaintiff, if any, were caused by the superseding and intervening acts of parties over whom Hilton had no right of control, and this conduct, either by omission or commission, interrupted the natural and proximate causal relationship, if any, between any act or omission of Hilton (which are denied) and the alleged injury to Plaintiff.

168. The causes of action asserted in the Complaint and any damages claimed are barred in whole or in part based on a failure to mitigate damages.

169. The causes of action asserted in the Complaint and any damages claimed are barred

in whole or in part because any damage, loss, or liability alleged must be reduced, diminished, and/or barred in proportion to any wrongful conduct of persons or entities other than Hilton under principles of proportionate responsibility, comparative fault, and/or comparable legal doctrines.

170. The causes of action asserted in the Complaint and any damages claimed are barred in whole or in part because the statutes sued upon are unconstitutionally vague and ambiguous.

171. The causes of action asserted in the Complaint and any damages claimed are barred in whole or in part because, to the extent that any employees committed any actionable acts or omissions, such acts or omissions were committed outside the scope of authority conferred.

172. The TVPRA does not allow for an award of exemplary damages, and, in any event, the Plaintiff is not entitled to exemplary damages. Moreover, the Complaint fails to establish that Hilton acted with intentional and outrageous conduct as required to justify the imposition of exemplary damages under federal common law. Hilton's actions with respect to Plaintiff were not extreme, outrageous, or conscience-shocking. Further, Plaintiff's claims are barred, in whole or in part, because the Complaint fails to establish that any officer, director, or managing agent of Hilton acted with malice, oppression, or fraud, or directed, knew, or approved of an employee's malice, oppression, or fraud as required to justify exemplary damages.

173. With respect to Plaintiff's claims for exemplary damages, Hilton specifically incorporates by reference any and all standards of limitation regarding the determination and/or enforceability of exemplary damage awards which arose in the decisions of *BMW of N. Am. v. Gore*, 517 U.S. 559 (1996); *Cooper Indus., Inc. v. Leatherman Tool Grp., Inc.*, 532 U.S. 424 (2001); *State Farm Mut. Auto. Ins. Co. v. Campbell*, 538 U.S. 408 (2003); and their progeny.

174. All claims are barred by the statute of limitations.

175. All claims are barred by estoppel, waiver, and/or laches.

176. The relief sought by Plaintiff is barred, in part or in whole, because Hilton did not know and should not have known about the sex trafficking of Plaintiff.

177. The relief sought by Plaintiff is barred, in part or in whole, because Hilton did not knowingly benefit from a sex-trafficking or any other venture of Plaintiff.

178. The relief sought by Plaintiff is barred, in part or in whole, because Hilton did not participate in a sex-trafficking or any other venture of Plaintiff.

179. The relief sought by Plaintiff is barred, in part or in whole, because Hilton cannot be held vicariously liable for the acts or omissions of Crosstown Center Hotel LLC.

180. Any injuries and/or damages alleged by Plaintiff were the result of an unforeseeable series of events over which Hilton had no control and for which Hilton cannot be held liable.

181. To the extent that Hilton is found liable, it reserves the right to seek indemnification from any party so liable as a matter of law or by contractual right. Nothing contained herein shall be construed as a waiver of that right.

182. At all times relevant herein, Hilton exercised reasonable care and acted in accordance with or exceeded all applicable municipal, city, state, and federal statutory, regulatory, and common law requirements, regulations, and standards.

183. Hilton expressly reserves the right to amend this Answer to add, delete, or modify affirmative and other defenses based on legal theories, facts, and circumstances which may be developed through discovery or further legal analysis of Plaintiff's claims.

* * *

WHEREFORE, Hilton prays that Plaintiff take nothing by virtue of the Complaint and that this action be dismissed in its entirety; that Hilton recover costs of suit and attorneys' fees incurred; and for such other and further relief as the Court may deem just and proper.

Dated: December 2, 2025

Respectfully submitted,

/s/ Jenna L. LaPointe

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*Attorneys for Defendant Hilton Domestic
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CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2025, a true copy of the foregoing document was filed with the Court and served upon all counsel of record via the Court's CM/ECF system.

Attorneys for Plaintiff Jane Doe (J.R.L.)

Attorneys for Defendant Crosstown Center Hotel LLC d/b/a Hampton Inn & Suites

/s/ Jenna L. LaPointe

Jenna L. LaPointe